



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

June 24, 2026

Melanie Bachman, Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051
Melanie.Bachman@ct.gov

Re: Petition 1710 – North Haven Solar Two, LLC (Petitioner) petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 1.90-megawatt AC ground-mounted solar photovoltaic electric generating facility and associated equipment located at 700 Middletown Avenue, 122 Mill Road and 208 Rimmon Road, North Haven, Connecticut, and associated electrical interconnection.

Dear Attorney Bachman:

The Council on Environmental Quality (Council) offers the following comments regarding Petition 1710.

Farmland Soils

The Petitioner states that “the Property is currently undeveloped farmland and woodlands. A review of the USDA’s soil mapping for the area indicates that 4 acres of prime farmland exists within the Project limits.” In addition to the four acres of prime farmland on the proposed site, the Council notes that the area located northeast of the prime farmland is designated as “farmland of statewide importance.” And although a determination of material affect from the Connecticut Department of Agriculture (DoAG) is not required given the capacity of the proposed project (less than two megawatts), the Council suggests that the Petitioner 1) conform to DoAG’s “Agrivoltaics Requirements for Solar Energy Generating Facilities located in whole or in part on Prime Farmland,” revised December 2023, and 2) incorporate agrivoltaics practices and low-impact development to enable additional agricultural co-use including, but not limited to, installing the solar panels higher above the ground and spaced farther apart than conventional systems to allow in enough sunlight to grow crops for harvesting or grazing. In addition, the Council recommends that best practices be employed during construction that might allow for the future restoration of farmland soils to more productive agricultural use by minimizing grading, trenching, and compaction of farmland soils.

Wildlife

The Petitioner notes that the Department of Energy and Environmental Protection’s (DEEP) Natural Diversity Database (NDDDB) provided a preliminary determination for the proposed facility on January 13, 2026, and that “the Petitioner intends to incorporate the recommended Best Management Practices for potential Rare, Threatened, and Endangered Species.” The Council notes that the Erosion and Sediment Control Plan, Sheet C-4.0 includes Wildlife Protection measures, including a provision that “all work can be performed between April 1 and October 31 during the active season of the species. In the event that work outside of these limits. is required, the contractor shall take the following precautions:” However, the NDDDB Determination letter stated that “land disturbance and excavation confined to the upland can be done without risk for impact to wood turtle if work is restricted to the dormant season (November 1- March 31).”

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Acting Chair

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William Warzecha

Paul Aresta
Executive Director

The NDDB Determination letter also included several “Best Management Practice” (BMP) recommendations that address mowing to better protect Eastern box turtle, which might be present in early successional habitat and fields. The Petitioner’s Draft Operations, Maintenance & Emergency Response Plan, dated April 2026, states that “grass around and under the array will be mowed in accordance with the schedule in Table 2 and will be maintained to a height to reduce the risk of fire.” The Council notes that Table 2 indicates that mowing and trimming would be performed “as needed”, which is vague and does not address NDDB’s BMP recommendations regarding mowing. The Council recommends that the BMP recommendations listed on the NDDB determination be incorporated accurately onto the project plans; that the Petitioner utilize an environmental monitor/qualified herpetologist to provide training to the contractors and to ensure that the recommended protection measures for wood turtle and Eastern box turtle are adhered to; that there be a gap at the bottom of the security fence to allow for the passage of turtles and other wildlife rather than “flush with surface grade”; and that the Operations, Maintenance and Emergency Response Plan be updated to address NDDB’s recommendations regarding mowing. Given the potential presence of two state-listed turtle species on the proposed site, the Council also recommends that the Petitioner ensure that only erosion and sedimentation control products that avoid/minimize the potential for wildlife entanglement be used on the proposed site.

The Council’s comments above address only certain elements of the materials provided by the Petitioner at the time of the filing. Additional information can become evident through comments offered by other parties and during the Siting Council’s administrative hearing process. The absence of comment(s) by this Council about any Petition or Application, or any aspects thereof, may not be interpreted as an endorsement of a proposed project, or its components or that this Council might not have comments or concerns on more specific issues raised during the hearing process.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta", with a stylized, flowing script.

Paul Aresta
Executive Director

c. Robin Blum, Connecticut DEEP Wildlife Division